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10 *Attorneys for Plaintiff, Wells Fargo Bank, N.A., as Trustee, for Park Place Securities, Inc. Asset-*
11 *Backed Pass-Through Certificates, Series 2005-WHQ2*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 WELLS FARGO BANK, N.A. AS TRUSTEE
11 FOR PARK PLACE SECURITIES, INC.
12 ASSET-BACKED PASS-THROUGH
13 CERTIFICATES, SERIES 2005-WHQ2,

14 Plaintiff,

15 vs.

16 FIDELITY NATIONAL TITLE GROUP, INC.;
17 FIDELITY NATIONAL TITLE INSURANCE
18 COMPANY; LAND TITLE OF NEVADA,
19 INC.; DOE INDIVIDUALS I through X; and
20 ROE CORPORATIONS XI through XX,
21 inclusive,

22 Defendants.

Case No.: 2:21-cv-00996-APG-DJA

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO
RESPOND TO FIDELITY NATIONAL
TITLE INSURANCE COMPANY'S
MOTION TO DISMISS [ECF No. 27]**

[Third Request]

23 COMES NOW Plaintiff, Wells Fargo Bank, N.A., as Trustee, for Park Place Securities,
24 Inc. Asset-Backed Pass-Through Certificates, Series 2005-WHQ2 ("Wells Fargo") and Defendant
25 Fidelity National Title Insurance Company ("FNTIC"), by and through their counsel of record,
26 hereby stipulate and agree as follows:

- 27 1. On May 24, 2021, Wells Fargo filed its Complaint in Eighth Judicial District Court, Case
28 No. A-21-835173-C [ECF No. 1-1];
2. On May 24, 2021, FNTIC filed a Petition for Removal to this Court [ECF No. 1];
3. On October 20, 2021, FNTIC filed its Motion to Dismiss [ECF No. 27];

4. Wells Fargo's deadline to respond to FNTIC's Motion to Dismiss is currently November 19, 2021 [ECF No. 35];
5. While Wells Fargo's counsel has prepared its response to FNTIC's Motion, due to the upcoming Thanksgiving holiday, Wells Fargo needs additional time to approve and finalize its response to FNTIC's Motion to Dismiss [ECF No. 27].
6. As such, Wells Fargo's counsel is requesting an extension until December 3, 2021, to file its response to FNTIC's Motion;
7. Counsel for FNTIC does not oppose the requested extension;
8. While this is the third request for an extension, Wells Fargo's original deadline was November 3, 2021, less than three weeks ago. This request is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

DATED this 19th day of November, 2021.

DATED this 19th day of November, 2021.

WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

/s/ Lindsay D. Dragon

/s/ Kevin S. Sinclair

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Attorneys for Plaintiff, Wells Fargo Bank, N.A., as Trustee, for Park Place Securities, Inc. Asset-Backed Pass-Through Certificates, Series 2005-WHQ2

Attorney for Defendants, Fidelity National Title Group, Inc. Fidelity National Title Insurance Company and Land Title of Nevada, Inc.

IT IS SO ORDERED:

Dated: November 22, 2021



ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE